Before the

FEDERAL COMMUNICATIONS COMMISSION

Washington, D.C. 20554

In the Matter of	)	
	)	
Amendment of Part 97 of the	)	WT Docket No. 05-235
Commission's Rules	)	
To Implement WRC-03 Regulations	)	RM-10781, RM-10782, RM-10783,
Applicable to Requirements for	)	RM-10784, RM-10785, RM-10786,
Operator Licenses in the Amateur	)	RM-10787, RM-10805, RM-10806,
Radio Service	)	RM-10807, RM-10808, RM-10809,
	)	RM-10810, RM-10811, RM-10867,
	)	RM-10868, RM-10869, RM-10870

To: The Commission

COMMENTS BY JAMES K. BOOMER (October 11, 2005)

The following comments are submitted regarding *Notice of Proposed Rule Making* (The Notice), FCC 05-143A1, WT Docket No. 05-235 released on July 19, 2005.

This document summarizes the key issues and facts regarding the need to retain the requirement for Morse code proficiency for radio amateur licensing.

Fact 1: Morse code is essential for emergency communications

The requirement for Morse code proficiency is mandatory in order for amateur radio to fully comply with the emergency communications provisions of Part 97, Sections 97.1, 97.3, and 97.4 of the Commission's Rules:

From Sec. 97.1 Basis and purpose:

"The rules and regulations in this part are designed to provide an amateur radio service having a fundamental purpose as expressed in the following principles:

(a) Recognition and enhancement of the value of the amateur service to the public as a voluntary noncommercial communication service, **particularly with respect to providing emergency communications** (emphasis added)."

In addition, five words-per-minute (5 WPM) Morse code can be decoded with 25.74dB less antenna terminal carrier input power than SSB Voice, and 11.1dB less antenna terminal carrier input than coded QPSK PSK31. ***This***

weak signal capability is a critical life and death difference in emergency communications[1].

All aviation navigation aids, such as VHF Omnirange, and non-directional beacons transmit Morse code identifiers. Some identify with both voice and Morse code. While on active duty as a U.S. Air Force fighter pilot, the author's knowledge of Morse code prevented a fellow pilot, who failed to read the navigation station's Morse code identifier, from flying to the wrong destination.

Fact 2: Removing Morse code requirements won't increase the number of radio amateurs

The amateur radio licensee statistics (http://ah0a.org/FCC/Licenses.html), referenced in the NPRM are informative. In April 2000, when the reduction of Morse code requirements to 5WPM began, with a principal aim at increasing the number of radio amateurs, there were 678,539 licensed radio amateurs. However, as of August 1, 2005, there were 661,301 licensed radio amateurs. So the total number of licensed radio amateurs has decreased 2.5% since the FCC relaxed the Morse code licensing requirements. Thus, the substantial reduction in Morse code requirements from 13 WPM for Advanced and General, and 20 WPM for Amateur Extra classes, to 5 WPM, has failed to produce an increase in the number of radio amateur licensees. Hence, the facts do not support the claim that a reduction of Morse code requirements would increase the number of radio amateurs.

Finally, those who claim that eliminating Morse code requirements from amateur radio licensing would result in many more people becoming radio amateurs, have yet to present any specific data to support that claim.

[1] See 09/20/05 James K. Boomer *Reply to Comments* for details

James K. Boomer Credentials

- Licensed radio amateur since February 1947 (current call is W9UJ)
- Electronics Engineer, BSEE (Major in Communications Electronics), 1954 from the University of Nebraska
- Radio Design Engineer, Collins Radio Company, Cedar Rapids, Iowa, 1954
- Jet Fighter Pilot, Instructor Pilot, and Communications Officer, U.S. Air Force, 1954-1957 (leave of absence from Collins Radio Company for military service)
- Radio and Communication Systems Design Engineer, Staff Engineer and Project Engineer (including project engineer on the 62S-1 VHF converter for the Collins HF "S-Line"), Collins Radio Company, Cedar Rapids, Iowa, 1957-1964
- Communication Systems Design Engineer and Project Engineer for National Cash Register Company, Dayton, Ohio, 1964 to 1966
- Communication Systems Staff Engineer, Design Engineer, Project Engineer, and Engineering Section Manager at Magnavox Company (now Raytheon), 1966-1974
- Communication Systems Senior Marketing Product Manager at Magnavox Company (now Raytheon), 1974-2000—Retired in 2000.